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Citizens Telecommunications Company)
of Illinois and Comm South Companies, Inc.)

Joint Petition for Approval of Negotiated)
Resale Agreement dated November 30, 2000,)
pursuant to 47 U.S.C. § 252.)

Docket No. 01-

CHIEF CLERK'S OFFICE

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**JOINT PETITION FOR APPROVAL OF NEGOTIATED
RESALE AGREEMENT BETWEEN
CITIZENS TELECOMMUNICATIONS COMPANY OF ILLINOIS
AND COMM SOUTH COMPANIES, INC.**

Citizens Telecommunications Company of Illinois ("Citizens") and Comm South Companies, Inc. ("Comm South"), through counsel, hereby request that the Illinois Commerce Commission (the "Commission") review and approve the attached Resale Agreement dated November 30, 2000 (the "Agreement"), pursuant to Sections 252(a)(1) and 252(e) of the Telecommunications Act of 1996, 47 U.S.C. § 252(a)(1) through 252(e) (the "Act"). In support thereof, the parties state as follows:

1. The Agreement was arrived at through good faith negotiations between the parties as contemplated by § 252(a) of the Act and provides for resale of telecommunications' services.

2. Pursuant to § 252(e)(2) of the Act, the Commission may only reject a negotiated agreement if it finds that (1) the Agreement discriminates against another carrier, or (2) implementation of the Agreement would not be consistent with the public interest, convenience, and necessity. Neither basis for rejection is present here.

3. As set forth in the attached Verification of F. Wayne Lafferty, Citizens will make the Agreement available to any other telecommunications carrier operating within its territory. Other carriers are also free to negotiate their own terms and conditions pursuant to the applicable provisions of the Act. For this reason, the Agreement is not discriminatory.

4. In accordance with § 252(e)(4) of the Act, the Agreement will be deemed approved if the Commission does not act to approve or reject the Agreement within 90 days from the date of this submission.


5. Copies of the Agreement are available for public inspection in Citizens' and Comm South's public offices.

WHEREFORE, Citizens Telecommunications Company of Illinois and Comm South's respectfully request that the Commission approve the attached Resale Agreement under § 252(e) of the Act as expeditiously as possible.

Dated: April 24, 2001

Respectfully submitted,

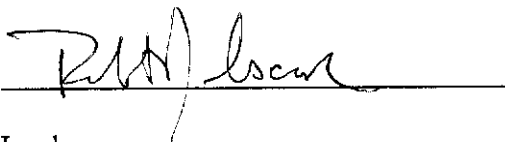
**CITIZENS TELECOMMUNICATIONS COMPANY
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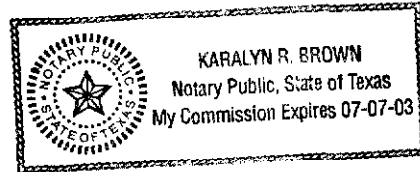
VERIFICATION

I, F. Wayne Lafferty, being first duly sworn on oath, depose and state that I am the Vice President, Regulatory & Government Affairs for Citizens Telecommunications Company of Illinois, that I have read the foregoing Petition and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information, and belief.


[Name]

Subscribed and sworn to before me
this 23 day of March, 2001.

Karalyn Brown
Notary Public



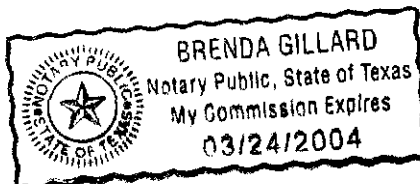
VERIFICATION

I, ROBERT J. ISAAC [name], being first duly sworn on oath, depose and state that I am the Active President [title] for Com Sound Co [company], that I have read the foregoing Petition and that I know the contents thereof, and that the same is true and correct to the best of my knowledge, information, and belief.

Robert J. Isaac
[Name]

Subscribed and sworn to before me
this 4 day of March, 2001.

Brenda Gillard
Notary Public



STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Citizens Telecommunications Company)	
of Illinois and Comm South Companies, Inc.)	
)	Docket No. 01-
Joint Petition for Approval of Negotiated)	
Resale Agreement dated November 30, 2000,)	
pursuant to 47 U.S.C. § 252.		

**STATEMENT IN SUPPORT OF JOINT PETITION
FOR APPROVAL OF NEGOTIATED RESALE AGREEMENT**

I, F. Wayne Lafferty, am the Vice President, Regulatory and Government Affairs for Citizens Telecommunications Company of Illinois ("Citizens"), and submit this Statement in Support of the Joint Petition for Approval of a Negotiated Resale Agreement between Citizens and Comm South Companies, Inc. ("Comm South").

The attached Resale Agreement (the "Agreement") between Citizens and Comm South was reached through voluntary negotiations between the parties. Accordingly, Citizens and Comm South request the approval of the Agreement by the Illinois Commerce Commission (the "Commission") pursuant to § 252(a)(1) and 252(e) of the Telecommunications Act of 1996 (the "Act").

In accordance with § 251 and 252 of the Act, the parties engaged in good faith negotiations and an agreement was reached on November 30, 2000. The Agreement will have a term of one year beginning the first business day after the Illinois Commerce Commission approval, and will be automatically renewed for successive one (1) year periods unless either Party indicates its intent not to renew the Agreement. The Agreement establishes the financial and operational terms for the resale between Citizens and Comm South. The key provisions of the Agreement are summarized as follows:

I. Description and Charges for Services

Telecommunications' services available for resale are shown in Exhibit A of the Interconnection Agreement.

Citizens will offer products to Comm South for resale pursuant to relevant decisions of the Commission.

Telecommunications' services will be offered by Citizens to Comm South for resale on terms and conditions that are reasonable and nondiscriminatory.

II. Fraud by End User(s)

Citizens will not be liable to Comm South for any fraud associated with Comm South End Users account, including 1+ IntraLATA toll calls, ported number, and Alternate Billing Service ("ABS").

The parties agree to cooperate with one another to investigate, minimize, and take corrective action in cases of fraud involving 1+ IntraLATA toll calls, ported numbers, and ABS.

In cases of suspected fraudulent activity by an End User, the parties will provide to one another, upon request, information concerning End Users' who terminate services provided by the party without paying all outstanding charges.

Citizens will provide notification messages to essential.com on suspected occurrences of ABS-related fraud on Comm South's accounts stored in the applicable Line Information Data Bases (LIDB).

III. Terms and Conditions for Resale of Services

Unless otherwise expressly provided, the rules and regulations associated with Citizens' retail tariffs shall apply when services are resold by Comm South.

Comm South shall only sell services to a single End User or multiple End Users in accordance with the terms and conditions set forth in the corresponding Citizens tariff.

Comm South shall not permit the sharing of a service by multiple End Users or the aggregation of traffic from multiple End Users onto a single service.

Comm South has signed this generic Resale Agreement without branding for Illinois.

Comm South shall only resell services furnished under the Agreement to the same category of End Users to whom Citizens offers such services.

Promotions of ninety (90) days or less are not available to Comm South for resale.

Comm South shall not use a resold service to avoid the rates, terms, and conditions of Citizens' corresponding retail tariff(s). Comm South shall not utilize resold services to avoid applicable access charges.

Citizens will afford Comm South's End Users the ability make 911 calls.

Citizens shall provide the services covered by the Agreement subject to the availability of existing facilities and on a nondiscriminatory basis with its other customers. Comm South shall resell the services only in those service areas where Citizens offers retail services to its End Users.

Under § 252(e)(1) and (2) of the Act, the Commission may reject the Agreement only if the Agreement or a portion thereof "... discriminates against a telecommunications carrier not a party to the agreement" or "... implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity." Because the Agreement is the product of voluntary negotiations, it does not have to comply with the standards set forth in § 252(d).


The Agreement is not discriminatory. Citizens will make this Agreement available to any other telecommunication's carrier who requests it and is operating within Citizens service territory. Other telecommunications' carriers can negotiate their own arrangements pursuant to the applicable provisions of the Act.

The Agreement is the product of good faith, arms-length negotiations between competitors. Overall, the Agreement is acceptable to both parties and it shows that two competitors, negotiating in good faith under the terms of the Act, can arrive at a mutually beneficial business arrangement that overall meets their individual business interests and furthers the cause of competition in the local exchange market. This is precisely the process Congress envisioned in crafting the Act. See S. Rep. No. 23, 104th Cong., 1st Sess. at p. 19. ("The Committee intends to encourage private negotiation of interconnection agreement.") (The Conference Committee on the Telecommunications Act of 1996 receded to the Senate on § 252(a) and (b), see Joint Explanatory Statement of the Committee of Conference at p. 125.)

The Agreement meets all the requirements of the Act and the Commission should approve it.


Name

Subscribed and sworn to before me
this 23 day of March, 2001.


Notary Public

